



STATE OF DELAWARE

PUBLIC SERVICE COMMISSION
861 SILVER LAKE BLVD.
CANNON BUILDING, SUITE 100
DOVER, DELAWARE 19904

TELEPHONE:
FAX:

(302) 736-7500
(302) 739-4849

May 31, 2019

Patrick Maloney
Inspire Energy Holdings, LLC
3402 Pico Blvd., Suite 215
Santa Monica, CA 90405

Re: In The Matter of Inspire Energy Holdings, LLC for A Certificate to Provide Electric Supply Services within the State Of Delaware (Submitted April 10, 2019) - PSC Docket No. 19-0218

Dear Mr. Maloney,

The Delaware Public Service Commission ("Commission") is in receipt of the application (the "Application") submitted by Inspire Energy Holdings, LLC ("Company") for certification to provide electric supply services in Delaware. The Application is incomplete as filed and additional information is necessary to complete the minimum filing requirements ("MFRs"), as indicated below:

Section 2.2.19 Retail Experience

- Please update the professional résumés provided to include the summary of duties for each position held by each officer of the Company.
- Please provide an explanation for the spike in complaints for the year 2018.
 - Please include steps taken to mitigate the cause of these complaints and any internal policies enacted as a result of the spike in complaints.
- Please provide all formal and informal complaints from the year 2018.
- How many internal investigations resulted in invalid sales in 2018?
 - How many reps were identified as having invalid sales in 2018?
 - How were they disciplined?
 - How many were let go in 2018?
- Please describe a situation where a sale would be invalid but not an intentional instance of slamming.
 - How often has this occurred in 2018?
 - What policies have been enacted to curtail these incidents?

Section 2.1.6 Verification of Application

- Please provide a signed, sworn statement of verification for each subsequent filing in this docket.

Sections 6.0, 7.0, 8.0 Contracts

- The Company has not provided any contracts for Small Commercial customers. Please submit these.
- On the Fixed Rate and Subscription Contracts and the terms and conditions under the Cancellation/Early Termination Fees section, please put the amount of the termination fee.

- On all of the Terms and Conditions, under Section 2 Right to Rescind, include the entire policy as stated in the Supplier Rules.
On all of the Terms and Conditions, under Section 7 Cancellation Provisions, include a separate paragraph on cancellation due to relocation that complies with the Supplier Rules.
- On all of the terms and Conditions, Section 13 Contact Information/Customer Complaints/Dispute Procedure, include the full contact information for the DE PSC and the DE DPA.
- On the Fixed Rate terms and conditions, Section 21 Customer Information Release Authorization, the last sentence of the paragraph states: "Inspire reserves the right to cancel this Agreement on fourteen (14) calendar days' notice in the event Customer rescinds such authorization." Include this statement on all of the products' terms and conditions.
- On the Fixed Rate Contract terms and conditions, under Section 6 Duration of Agreement, identify whether service continues at a fixed or variable rate from month-to-month.
 - If it continues at a variable month-to-month, include the information for accessing the future and historical pricing and the applicable statements for variable products.
- On the Fixed Rate Contract terms and conditions, under Section 10 Renewal Provision/Agreement Expiration, the sentence that starts "For Agreements renewing to a variable price..." should start a new paragraph.
- On the Variable rate contract summary and terms and conditions, under Price Structure and Variable Price, please adhere to the following sections of the Supplier Rules: 6.2.2.3.2.3, 6.2.2.3.2.4, and 6.2.2.3.2.5.

The Company may request that the Commission provide confidential treatment to some or all of the information contained in a document. When requesting confidential treatment for documents filed with the Commission, please simultaneously file a redacted, public version of the same document and an attestation that the information is not subject to inspection or disclosure to the public.

Staff respectfully requests a response to this notice of deficiency on or before June 28, 2019. Please note that 26 *Del. Admin. C.* § 3001 (the "Supplier Rules") section 2.4 provides that incomplete applications will be closed four (4) months after the filing date. If the application is not completed within the four (4) month time frame the applicant forfeits their application filing fee and must resubmit the application with an additional filing fee. The responses and verifications can be uploaded as a subsequent filing in DelaFile under Docket No 19-0218.

Should you have any questions or if I can be of any assistance you may contact me at (302) 736-7539 or send questions by email to Clishona.Marshall@state.de.us.

Sincerely,

Shona Marshall

Shona Marshall
Public Utility Analyst

CC: Ms. Donna Nickerson, Commission Secretary
Ms. Malika Davis, Public Utility Analyst